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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 2.106 of	)	
the Commission's Rules to	)	ET Docket No. 93-59
Allocate Spectrum for	)	RM-8092
Wind Profiler Radar Systems	)	

To: The Commission

COMMENTS OF THE
UTILITIES TELECOMMUNICATIONS COUNCIL

Pursuant to Section 1.415 of the Commission's Rules, the Utilities Telecommunications Council (UTC) hereby submits its comments with respect to the Notice of Proposed Rulemaking and Notice Of Inquiry (NPRM/NOI), 8 FCC Rcd 2546 (1993), released

pipelines are members of UTC, ranging in size from large combination electric-gas-water utilities serving millions of customers to small, rural electric cooperatives and water districts serving only a few thousand customers. UTC is also the Federal Communications Commission's (FCC) certified frequency coordinator for the Power Radio Service. All utilities depend upon reliable and secure communications facilities in carrying out their public service obligations. In order to meet these

azimuth. Wind profilers typically can operate in the frequency range of 50 MHz to 1200 MHz.

Currently experimental wind profiler systems are operating at 404 MHz, but despite using interference avoidance techniques, these profilers have caused interference to government satellite systems that have uplinks in the adjacent 406 MHz band. In response to this interference the National Telecommunications and Information Administration (NTIA) conducted a study to identify a more suitable frequency for wind profilers, and concluded that 449 MHz is the best available frequency. The 449 MHz band is currently allocated on a primary basis to the Federal government for radiolocation operations by the military, and on a secondary basis to the Amateur Radio Service.

Consistent with NTIA's recommendations the FCC proposes to add a new footnote US329 to the domestic Table of Frequency Allocations that will provide for operation of Government and experimental non-Government wind profiler systems at 449 MHz on a primary basis.

B. The FCC Must Adopt Measures To Ensure Against Interference To Power Radio Operations

While not opposing the introduction of wind profilers into the 449 MHz band, UTC is concerned about potential interference to adjacent Private Land Mobile Radio systems operating in the 451 MHz band. The Power Radio Service has a number of channels at the low end of the 451 MHz band that are used extensively by utilities for base and mobile operations. Power Radio facilities

and other private radio licensees must be ensured of interference protection from wind profilers deployed in the 449 MHz band.

Accordingly, prior to taking any action the FCC should determine the interference potential posed by the introduction of

A number of utilities operate automatic meter reading equipment and other distribution automation equipment in the 902-928 MHz band on a Part 15 unlicensed basis. While entities that operate on a Part 15 basis are understood to have no interference protection rights, the FCC should not cavalierly dismiss the significant operational and financial investment in equipment that utilities and others have made in the 902-928 MHz band in order to meet the spectrum requirements of an esoteric service that may not develop.[2/]

The FCC should attempt to balance the needs of existing users in the 902-928 MHz band and those of Radian by adopting measures to mitigate potential interference. Specifically, in the 915 MHz band the Commission should: (1) limit the location of wind profiler systems to rural areas; (2) require the construction of RF screens, in the form of perimeter fences and berms; and (3) require public notice of all new wind profiler application grants.

[2/] The Commission previously reviewed utilities' use of other critical systems operating on a Part 15 basis, namely Power Line Carrier (PLC) systems, and adopted reasonable provisions designed to ensure the successful sharing of spectrum by unlicensed PLC

IV. CONCLUSION

Prior to making any allocation decisions the Commission should thoroughly assess the interference potential of wind profilers to adjacent channel Private Land Mobile Radio systems, and enact appropriate safeguards to protect against such interference. The Commission should also attempt to balance the needs of existing Part 15 operations in the 902-928 MHz band and the need for additional spectrum to implement private wind profiler systems.

WHEREFORE, THE PREMISES CONSIDERED, the Utilities Telecommunications Council respectfully requests the Commission to take actions consistent with the views expressed herein.

Respectfully submitted,

UTILITIES TELECOMMUNICATIONS COUNCIL

By: _____
Jeffrey L. Sheldon
General Counsel

By: _____
Sean A. Stokes
Staff Attorney

Utilities Telecommunications Council
1140 Connecticut Avenue, N.W.
Suite 1140
Washington, D.C. 20036

(202) 872-0030

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